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Attorneys for Defendants, Cool Clouds Distribution, Inc., Umais Abubaker
and Shahid Shaikh

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RUTH LARA, individually and as Guardian
of her minor child J.S., on behalf of
themselves and on behalf of those similarly
situated,

Plaintiffs,

v.

PUFF BAR, NICK MINAS, PATRICK
BELTRAN, COOL CLOUDS DISTRIBUTION,
INC., UMAIS ABUBAKER and SHAHID
SHAIKH,

Defendants.

CASE NO. 2:20-cv-08030-SDW-LDW

**DECLARATION OF
SHAHID SHAIKH IN SUPPORT OF
MOTION TO DISMISS**

SHAHID SHAIKH, of full age, being duly deposed according to law, declares as
follows:

1. I am a defendant in the above captioned matter. I am fully familiar with

the facts recited herein.

2. I am a resident of the State of California, residing at 3725 Midvale Avenue, Los Angeles, California.

3. I have never transacted any business whatsoever in the State of New Jersey.

4. I own no property in the State of New Jersey. I have never leased property in the State of New Jersey. I have no bank accounts in the State of New Jersey. I have no postal boxes in the State of New Jersey. I have no agents or employees in the State of New Jersey. I have never been in the State of New Jersey.

5. I have no interest in and no personal relationship with the defendant, Puff Bar, a California corporation.

6. I am not an officer of Cool Clouds Distribution. I was not part of Cool Cloud's management. I was employed and paid by Cool Clouds to serve Mr. Abubaker as his personal and professional assistant.

7. It would be a substantial hardship for me to have to defend this action in New Jersey.

I declare and affirm under the penalties of perjury of the Law of the United States that the foregoing statements made by me are true and correct of my own personal knowledge.

A handwritten signature in black ink, appearing to read 'Shahid', with a stylized flourish underneath.

DATED: November 09, 2020

SHAHID SHAIKH